## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:	PROMESA Title III	
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,		
as representative of	Case No. 17 BK 3283-LTS	
THE COMMONWEALTH OF PUERTO RICO, et al.	(Jointly Administered)	
Debtors.		
In re:	PROMESA	
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	Title III	
as representative of	Case No. 17 BK 03284-LTS	
PUERTO RICO SALES TAX FINANCING CORPORATION (COFINA),	Claim Number: 126061; 12856 & 141489	

## RESPONSE TO PUERTO RICO SALES TAX FINANCING CORPORATION'S EIGHTEENTH OMNIBUS OBJECTION TO DEFICIENT CLAIMS TO THE HONORABLE COURT:

Re Docket No. 4504

Debtor.

Comes now, Creditor, Funeraria Shalom Memorial Inc. and submits its response to COFINA Eighteenth Omnibus Objection to proof of claims number 126061; 12856; 141489. In support of its claims, creditor respectfully STATES and PRAYS as Follows:

1. On June 29, 2018, creditor filed several Proof of Claim arising out of COFINA Bonds owed by Funeraria Shalom Memorial Inc. which include proof of claims number 126061; 12856; 141489.

POC No.	CUSIP	AMOUNT

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126061	745291VD3	\$20,000.00
12856	745291VH4	\$100,000.00
141489	745291VJ0	\$65,000.00

- 2. On December 19, 2018, COFINA filed its Eighteenth Omnibus Objection (Docket Entry 4504) allegedly as to deficient proofs of claims listed in Exhibit A: Insufficient Basis Bond Claims. Funeraria Shalom Memorial Inc.'s proof of claims number 126061; 12856; 141489 are included on pay 2 of said Exhibit A.
- 3. COFINA alleges that Funeraria Shalom Memorial Inc. has failed to provide the basis or documentation to justify said claim against COFINA.
- 4. Therefore, as evidence that Funeraria Shalom Memorial Inc. has a valid claim, Funeraria Shalom Memorial Inc. is submitting the following documents, attached hereto as Exhibit A. a. UBS
- 5. Section 502(a) of the Bankruptcy Code, 11 U.S.C. §502(a), states that a proof of claim is deemed to be allowed unless an objection is presented. COFINA objected to the validity of creditor's claim for allegedly being deficient. The documents presented in this response, serve as the corroborating evidence that Cofina is not taking in account significant amounts of this creditor's claims and interests.
- 6. Given the above, Funeraria Shalom Memorial Inc. respectfully asks this court to deny the Eighteenth Omnibus Objection with respect to this creditor.

## RESPECTFULLY SUBMITTED.

**I HEREBY CERTIFY** that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of February, 2019.

S/ Alexis A. Betancourt Vincenty Alexis A. Betancourt Vincenty USDC-PR No. 301304 Lugo Mender Group, LLC 100 Carr. 165 Suite 501 Guaynbao, P.R. 00968-8052 Tel. (787) 707-0404 Fax (787) 707-0412 a\_betancourt@lugomender.com